## OFFICIAL FILE ILLINOIS COMMENCE COMMISSIONATE OF ILLINOIS

ORIGINAL

ILLINOIS
COMMERCE COMMISSIONAL

## **ILLINOIS COMMERCE COMMISSION**

2004 OCT 151P 2:11

CENTRAL ILLINOIS LIGHT	) CHIEF CLERK'S OFFICE
COMPANY, d/b/a AmerenCILCO	) RA N.20
	) Docket No. UT-UDO
Petition for Review and Approval of	)
Integrated Distribution Company	)
Implementation Plan of	)
AmerenCILCO Pursuant to Part 452.	)

## **PETITION**

COME NOW Central Illinois Light Company, d/b/a AmerenCILCO ("AmerenCILCO"), and hereby request that the Illinois Commerce Commission ("Commission") review and approve its Integrated Distribution Company.

Implementation Plan ("IDC Plan"). In support of its Petition, AmerenCILCO states as follows:

- 1. AmerenCILCO is a wholly-owned subsidiary of Ameren Corporation, and owns and operates an electric distribution system in Illinois.
- 2. On January 24, 2002, the Commission issued a Final Order in Docket Nos. 98-0147 and 98-0148, consolidated, which adopted 83 Ill. Adm. Code 452 Subpart A: Functionally Separated Utility Rules ("FSU Rules") and Subpart B: Integrated Distribution Company Rules ("IDC Rules").
- 3. The above rules provide for an electric utility in Illinois to either be subject to Subpart A or Subpart B of 83 Ill. Adm. Code 452. Subpart A applies to an electric utility in Illinois that is not otherwise approved to operate as an Integrated

Distribution Company ("IDC") pursuant to Subpart B. An option is available in Subpart B for an electric utility to elect to become subject to Subpart B and, if approved, to operate as an IDC.

- 4. In order to seek Commission approval to operate as an IDC, an electric utility must file a written implementation plan by which it will implement and affirm its commitment to comply with the provisions of the IDC Rules.
- 5. By way of background, Central Illinois Light Company had filed a plan seeking FSU status, which matter was docketed as Docket No. 02-0391. This docket was held in abeyance. By way of further background, as a condition to Ameren's acquisition of AmerenCILCO in Docket No. 02-0428, AmerenCILCO was required to file its IDC Plan on or about January 31, 2004. However, as documented in the Petition filed by AmerenCILCO in Docket No. 04-0242, because of the challenge to Ameren Energy Marketing Company's certification as an ARES, AmerenCILCO sought a delay in the filing of the IDC Plan. In a related filing in Docket No. 02-0428, on April 13, 2004, the Commission granted AmerenCILCO's motion to delay the filing of the IDC Plan.
- 6. AmerenCILCO intends to operate as an IDC, if so approved, under virtually the same systems, policies and practices as was approved for Central Illinois Public Service Company d/b/a AmerenCIPS and Union Electric Company d/b/a AmerenUE, in Docket No. 02-0392. Attached hereto is AmerenCILCO's IDC Plan.

WHEREFORE, Central Illinois Light Company d/b/a AmerenCILCO respectfully requests that the Commission review and approve its Integrated Distribution Company Implementation Plan, and for such other and further relief as deemed equitable and just.

Dated: October 13, 2004

Respectfully submitted,

CENTRAL ILLINOIS LIGHT COMPANY, d/b/a AmerenCILCO

By

Edward C. Fitzhenry

ARDC #6180218

Associate General Counsel Ameren Services Company

1901 Chouteau Avenue

P.O. Box 66149 (MC 1310)

St. Louis, MO 63166-6149

(314) 554-3533

(314) 554-4014 (fax)

efitzhenry@ameren.com

## **VERIFICATION**

STATE OF MISSOURI	)
	) SS
CITY OF ST. LOUIS	)

I, Edward C. Fitzhenry, an attorney for Central Illinois Light Company, being duly sworn upon my oath, do hereby state that I have read the foregoing document and that the facts stated therein are true and correct to the best of my knowledge, information and belief, and that I am authorized to file such document on behalf of Central Illinois Light Company.

Edward C. Fitzhenry

Subscribed and sworn to before me this 13<sup>th</sup> day of October, 2004.

Valeue W. Whitehead Notary Public

VALERIE W. WHITEHEAD
Notary Public - Notary Seal
STATE OF MISSOURI
Jefferson County
My Commission Expires: Dec. 10, 2006